

EX

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(J013-c-p-21-95)

The Hon. William H. Seals,
12th Judicial Presiding Judge

P. O. Box 143

Marion SC 29571



Robert Graham (178039)

✓ applicant

State of South Carolina
Representative

Dec 23, 2013

Sworn affidavit
Motion for defaultPersonally appeared before me duly
sworn.

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CERTIFIED: A TRUE COPY

Connie Reel Shippin:

CLERK OF COURT C.P.&G.S.
FLORENCE COUNTY, S.C.

(1) applicant filed/served notice and motion for relief judgement by summons upon the state, pursuant to S.C. code Ann 17-27-70(c) on the plaintiffs, defendants, pursuant to Odum, Austin, and Wilson, legal and factual genuine issues of material facts, how he is entitled to relief judgement as a matter of law, and facts,

(2) assistant attorney Joshua D. Thomas only responded in part to applicants reasons why the conditional and final order should not become final.

- (3) pursuant to SCRAP 12 and 14) ~~for~~ failure to respond to a verifications; ~~Previously filed~~ is an admission to the assertions, ~~accusations~~ and findings. is an admission.
- (4) Mr. Thomas [intends] for you Judge Seals to sign a final order of dismissal, unless including the notice and motion filed before the court 2013, Oct 24 AM 11:45 am
- (5) This [must] be included in your 59(e) motion pursuant to plaintiff's motion, according to findings of facts and conclusions of law.
- (6) Mr. Thomas answered all applicants' objections except this one, Dec 4, 2013, applicant received his proposed order for you for final dismissal. He is in default pursuant to Rule 56 and SCRAP 12 and 11 and 14)
- (7) If you are going to allow him to over-looked procedures, and not respond to applicants proper filed motion for relief, Judge yourself, please at least include it in your altering and amending judgment pursuant to 59(e).

Sworn to and subscribed before me
The 20 day of July December
Cyrus C. Howell
Notary Public S

My Commission Expires
September 25, 2023

SCJ

Hon William H. Seals
P.O. Box 143
Marion SC 29571
KLR/PLH-I
12-20-13